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8 Attorneys for Lincoln Electric Holdings; The
 ESAB Group, Inc (erroneously named as
 9 "ESAB Group, Inc., as itself and successor to
 Alloy Rods Inc. and L-TEC Welding and
 Cutting Systems, Inc."); The Lincoln Electric
 Company; A.O. Smith Corporation; Praxair, Inc.
 11 (erroneously named as "Praxair, Inc., as
 successor to Linde Air Products"); Union
 Carbide Corporation (erroneously named as
 12 "Union Carbide Corporation, as successor to
 Linde Air Products and Haynes Satellite
 Works"); Viacom Inc., successor by merger to
 14 CBS Corporation, f/k/a Westinghouse; Hobart
 Brothers Company (erroneously named as
 15 "Hobart Brothers Company, as itself and
 successor to Teledyne McKay, Inc." and
 16 "McKay Welding Products"); The BOC Group,
 Inc. f/k/a Airco, Inc. (erroneously named as
 17 "AIRCO/The BOC Group, Inc., as itself and as
 successor to Airco, Inc. (f/k/a Air reduction Co.)
 18 and Wilson Welder & Metal Co."); Allegheny
 Technologies, Inc.; Lincoln Global, Inc.;
 19 Sandvik, Inc. (erroneously named as "Sandvik
 Materials Technology Company"); Airgas Gulf-
 States, Inc., and BOC, Inc. (served herein as
 20 "BOC Financial Corporation (Former Name)
 21 BOC, Inc.(True Name)")

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 JOHN LASSUS, an individual and ELIZABETH
 LASSUS, an individual,

25 Plaintiffs,

26 vs.

27 A.O. SMITH CORPORATION; ADAMS
 28 HARD-FACING COMPANY, INC.; AIR

No.: C06-04822 JSW

**STIPULATION AND [PROPOSED]
 ORDER STAYING PROCEEDINGS**

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

1 PRODUCTS & CHEMICALS, INC.; AIRCO
 2 INC.; AIRCO/THE BOC GROUP, INC., as itself
 3 and as successor to Airco, Inc. (f/k/a Air
 4 Reduction Co.) and Wilson Welder & Metal Co.;
 5 AIRGAS-GULF STATES, INC.; ALLEGHENY
 6 TECHNOLOGIES, INC. as successor to
 7 Teledyne-McKay Welding Products; AVESTA
 8 POLARIT, INC.; BOC FINANCIAL CORP.;
 9 THE BOC GROUP, INC.; CATERPILLAR,
 10 INC.; THE ESAB GROUP, INC.; ESAB
 11 GROUP, INC., as itself and as successor to Alloy
 12 Rods Inc., and L-TEC Welding and Cutting
 13 Systems, Inc.; GENERAL ELECTRIC
 14 COMPANY; HAYNES INTERNATIONAL,
 15 INC.; HOBART BROTHERS COMPANY, as
 16 itself and as successor to Teledyne McKay, Inc.;
 17 ILLINOIS TOOL WORKS, INC., as successor to
 18 Hobart Brothers Corp., Teledyne McKay, Inc. and
 19 Miller Electric Manufacturing Corp.; THE
 20 LINCOLN ELECTRIC COMPANY LINCOLN
 21 ELECTRIC HOLDINGS; LINCOLN GLOBAL,
 22 INC., also known as Seal Seat Corporation;
 23 MCKAY WELDING PRODUCTS;
 24 METROPOLITAN LIFE INSURANCE
 25 COMPANY; MILLER ELECTRIC
 26 MANUFACTURING CO., INC ; PRAXAIR,
 27 INC., as successor to Linde Air Products;
 28 RANKIN INDUSTRIES, INC.; STOODY
 COMPANY, as itself and as successor to the
 Deloro Stellite Company; THERMADYNE
 HOLDINGS CORPORATION, as itself and as
 successor to the Deloro Stellite Company, Stooddy
 Company, and Tweco Products, Inc.; UNION
 CARBIDE CORPORATION, as successor to
 Linde Air Products and Haynes Stellite Works;
 VIACOM, INC.; WESTINGHOUSE ELECTRIC
 CORPORATION; J.W. HARRIS COMPANY,
 INC.; OLSON AND CO. STEEL, individually
 and as successor-in-interest to BOSTROM-
 BERGEN METAL PRODUCTS; BOSTROM-
 BERGEN METAL PRODUCTS; VICTOR
 EQUIPMENT COMPANY; HUNTINGTON
 ALLOYS CORPORATION f/k/a Inco Alloys
 International Inc.; SANDVIK MATERIALS
 TECHNOLOGY COMPANY; THERMADYNE
 INDUSTRIES aka Stooddy; EAST BAY
 WELDING SUPPLY, INC.; CALIFORNIA
 WELDING SUPPLY COMPANY; GENUINE
 PARTS COMPANY; and Does 1-1000,

Defendants.

1 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
2 attorneys of record that all proceedings in this matter be stayed pending a transfer of this action to
3 In re Welding Fume Products Liability Litigation, MDL No. 1535 (N.D. Ohio).

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5 Throughout the period during which the transfer is pending, the parties stipulate to a stay of
6 Defendants' obligation to respond to the complaint and of the parties' right to propound discovery.
7 During this period, the parties respectfully request that this Court refrain from issuing any
8 scheduling orders in this matter, including but not limited to case management orders and orders
9 pertaining to Alternative Dispute Resolution. Furthermore, any and all case management
10 conferences currently on calendar are now removed.

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12 SO STIPULATED AND AGREED
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REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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2 DATED: August 18, 2006
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4 REED SMITH LLP

5 By 

6 Albert B. Norris
7 Stephen G. Blitch
8 Daniel J. Valim

9 Attorneys for Defendants

10 Lincoln Electric Holdings; The ESAB Group, Inc
11 (erroneously named as "ESAB Group, Inc., as itself
12 and successor to Alloy Rods Inc. and L-TEC
13 Welding and Cutting Systems, Inc."); The Lincoln
14 Electric Company; A.O. Smith Corporation;
15 Praxair, Inc. (erroneously named as "Praxair, Inc.,
16 as successor to Linde Air Products"); Union
17 Carbide Corporation (erroneously named as "Union
18 Carbide Corporation, as successor to Linde Air
19 Products and Haynes Satellite Works"); Viacom
20 Inc., successor by merger to CBS Corporation, f/k/a
21 Westinghouse; Hobart Brothers Company
22 (erroneously named as "Hobart Brothers Company,
23 as itself and successor to Teledyne McKay, Inc."
24 and "McKay Welding Products"); The BOC Group,
25 Inc. f/k/a Airco, Inc. (erroneously named as
26 "AIRCO/The BOC Group, Inc., as itself and as
27 successor to Airco, Inc. (f/k/a Air reduction Co.)
28 and Wilson Welder & Metal Co."); Allegheny
Technologies, Inc.; Lincoln Global, Inc.; Sandvik,
Inc. (erroneously named as "Sandvik Materials
Technology Company"); Airgas Gulf-States, Inc.,
and BOC, Inc. (served herein as "BOC Financial
Corporation (Former Name) BOC, Inc.(True
Name)")

21 DATED: 8/24/06
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23

24 GREENE BROILLET & WHEELER, LLP

25 By 

26 Bruce Fishelman
27 Helaine Hatter
28 Attorneys for Plaintiffs

REED SMITH LLP
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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

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3 DATED: August 29, 2006

4 By


The Honorable Jeffrey S. White

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6 DOCSOAK-9842668.1

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